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SS MANAGEMENT, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SS MANAGEMENT, LLC; DOES AND
ROES CORPORATION 1-100

Plaintiff(s),

vs.

DOUGLAS County, a political subdivision
of the State of Nevada; COMMISSIONER
WESLEY RICE, in his individual and
official capacity; COMMISSIONER MARK
GARDNER, in his individual and official
capacity; COMMISSIONER DANNY
TARKANIAN, in his individual and official
capacity; COMMISSIONER SHARLA
HALES, in her individual and official
capacity; COMMISSIONER NATHAN
TOLBERT, in his individual and official
capacity; DOES 1 THROUGH 100, AND
DOES AND ROES CORPORATIONS 1
THROUGH 100 inclusive.

Defendant(s).

Case No.: 3:25-cv-00062-MMD-CLB

**ORDER GRANTING JOINT STIPULATION
TO EXTEND TIME TO FILE
OPPOSITION TO DEFENDANT'S MOTION
TO DISMISS AND REQUEST FOR JUDICIAL
NOTICE, AND TO EXTEND DEADLINE TO
FILE JOINT CASE MANAGEMENT REPORT
(First Request)**

Pursuant to **Federal Rule of Civil Procedure 6(b)** and **Local Rules IA 6-1
and 7-1**, Plaintiff SS MANAGEMENT, LLC ("Plaintiff"), by and through its counsel of
record, Jordan K. Laub, Esq., and Defendants DOUGLAS COUNTY and
COMMISSIONER(S) WESLEY RICE, MARK GARDNER, DANNY TARKANIAN,

1 SHARLA HALES, AND NATHAN TOLBERT (“Defendants”), by and through its
2 counsel of record, Zachary J. Wadle, Esq., hereby stipulate and agree as follows:

- 3 1. On or about April 15, 2025, Defendants filed a Motion to Dismiss and a Request
4 for Judicial Notice.
- 5 2. Plaintiff’s counsel is currently out of the country and unavailable due to a pre-
6 planned vacation, with limited access to court filings and legal resources, and
7 will return on or about May 10, 2025.
- 8 3. The parties have conferred and agree that Plaintiff shall have until **May 24,**
9 **2025**, to file its opposition(s) to Defendants’ Motion to Dismiss and Request for
10 Judicial Notice.
- 11 4. Pursuant to the Court’s April 15, 2025 Order (ECF No. 15), the parties are also
12 required to submit a Joint Case Management Report by **May 30, 2025**. Due to
13 Plaintiff’s counsel’s unavailability until May 10, the parties stipulate to extend
14 the deadline to file the Joint Case Management Report to **June 14, 2025**, to
15 allow sufficient time for a meaningful meet-and-confer process and preparation.
- 16 5. This is the first request for extension of these deadlines. This stipulation is
17 made in good faith and not for the purpose of delay.
- 18 6. This stipulated extension does not alter the date of any hearing currently
19 scheduled in this matter.

20 
IT IS SO ORDERED

21 UNITED STATES MAGISTRATE JUDGE
22 DATED: April 28, 2025

23 Dated: April 24, 2025

24 /s/ Jordan K. Laub

JORDAN K. LAUB, ESQ.

25 Attorney for Plaintiff, SS Management, LLC

26 Dated: April 23, 2025

27 /s/ Zachary J. Wadle

ZACHARY J. WADLÉ, ESQ.

28 Deputy District Attorney

Attorney for Defendants

Douglas County and Commissioners